

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Misuse of Internet Protocol (IP) Captioned)	CG Docket No. 13-24
Telephone Service)	
)	
Telecommunications Relay Services and)	
Speech-to-Speech Services for Individuals with)	CG Docket No. 03-123
Hearing and Speech Disabilities)	

REPLY COMMENTS OF CLEARCAPTIONS, LLC

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Dated: October 16, 2018

EXECUTIVE SUMMARY

ClearCaptions, LLC (“ClearCaptions” or “Company”) appreciates the opportunity to provide these reply comments in response to the Further Notice of Proposed Rulemaking (“FNPRM”) in connection with the Commission’s exploration of how to fund, administer, and determine eligibility for Internet Protocol Captioned Telephone Service (“IP CTS”) such that the service is available to all who need it, consistent with the mandate of the Americans with Disabilities Act. ClearCaptions focuses these reply comments on (1) IP CTS rate setting and issues with the proposal to use a reverse auction in setting a single IP CTS rate; (2) the implications of state administration of IP CTS; and (3) eligibility to use IP CTS.

With respect to rates, the Company continues to oppose the use of a reverse auction. A reverse auction is an attempt to cement the dominance of a single provider with the largest current market share and would thus wreak havoc on competition in the IP CTS industry. ClearCaptions believes that, as the Commission concluded with respect to Video Relay Service, a reverse auction would present an unacceptable choice between setting a rate that would be too low such that competition would be stifled or too high such that the lowest-cost providers would receive a windfall. In lieu of a reverse auction, ClearCaptions continues to advocate for adoption of its tiered rate model.

ClearCaptions joins various consumer groups and IP CTS providers that oppose the transition of IP CTS administration to the states. From a legal and policy perspective, state administration of IP CTS conflicts with federal policy concerning the uniform treatment of interstate information services like IP CTS and would, in many states, require a change in law or the adoption of new laws, a process that would be lengthy and complicated and could result in a

reduction, interruption, or denial of service to IP CTS customers in the interim. ClearCaptions urges the Commission to decline to move administration of IP CTS to the state level.

Finally, the Company continues to oppose IP CTS eligibility assessments by state TRS programs and third-party hearing healthcare professionals (“HCPs”). There is general agreement in the record that state TRS programs should not have a role in determining IP CTS eligibility. ClearCaptions agrees. Some stakeholders favor certification by third-party HCPs, which the Company considers to be extremely problematic in light of on-the-ground experience with HCPs engaged in preferred provider or quid-pro-quo relationships with certain IP CTS providers that can result in the certification of ineligible consumers and/or the denial of service to clearly eligible consumers. Should the Commission seriously consider third-party HCP certification, it must first act against HCPs engaged in these abusive practices and provide outreach and training to ensure that HCP/IP CTS provider relationships do not stifle competition or result in “preferred” relationships that are ultimately detrimental to the TRS Fund and consumers. As it did in its Initial Comments, ClearCaptions would suggest adoption of an online eligibility assessment tool, which would treat IP CTS providers in a neutral manner and would be beneficial to both consumers and the Commission.

TABLE OF CONTENTS

I.	INTRODUCTION AND OVERVIEW	1
II.	A REVERSE AUCTION IS INEQUITABLE AND ANTICOMPETITIVE.....	2
III.	THERE IS BROAD AGREEMENT THAT ADMINISTRATION OF IP CTS SHOULD NOT BE TRANSITIONED TO THE STATES	6
IV.	CLEARCAPTIONS CONTINUES TO OPPOSE IP CTS ELIGIBILITY ASSESSMENTS BY STATE TRS PROGRAMS/EDPS AS WELL AS BY HCPS.....	8
V.	CONCLUSION.....	11

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I. INTRODUCTION AND OVERVIEW

ClearCaptions, LLC (“ClearCaptions” or “Company”) hereby submits its reply comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Further Notice of Proposed Rulemaking proposing further changes to the Internet Protocol Captioned Telephone Service (“IP CTS”) compensation structure and certain other rules.¹ ClearCaptions’ reply comments focus on the following three areas: (1) the use of reverse auctions to set IP CTS compensation; (2) state administration of IP CTS; and (3) IP CTS eligibility certification.

First and foremost, ClearCaptions continues to oppose any suggestion that the Commission employ a reverse auction to set IP CTS compensation rates. While a reverse auction may result in short-term savings to the TRS Fund, such a mechanism would diminish or eliminate any semblance

¹ *In the Matter of Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, CG Docket Nos. 13-24 and 03-123, FCC 18-79 (rel. June 8, 2018) (“FNPRM”). These reply comments are timely filed in accordance with the publication of the FNPRM in the Federal Register and the Commission’s public notice regarding the same. IP CTS Modernization and Reform, 83 Fed. Reg. 33899 (July 18, 2018); *Consumer and Governmental Affairs Bureau Announces Comment Deadlines for Internet Protocol Captioned Telephone Service Further Notice of Proposed Rulemaking and Notice of Inquiry*, Public Notice, CG Docket Nos. 13-24 and 03-123, DA 18-756 (rel. July 23, 2018).

of competition in the IP CTS market and result in only further cementing the position of a single dominant provider. In lieu of a reverse auction, the Company continues to recommend that the Commission adopt ClearCaptions' tiered rate model.² Second, the record shows considerable agreement among providers and consumer groups that the Commission should not shift the administration of IP CTS to the states. ClearCaptions continues to support this position along with the rest of the industry. Third, the record also demonstrates that there is little support for the Commission's proposal to delegate authority for IP CTS eligibility assessments to state entities. However, some stakeholders support the Commission's proposal to require eligibility assessments by hearing healthcare professionals ("HCPs"). ClearCaptions continues to believe that reliance on HCPs will inevitably be marked by abusive joint marketing and other schemes that result in the certification of ineligible users and believes that some type of online assessment would be competitor-neutral and would better serve the interests of consumers and the Commission. If the Commission embraces HCP certification, it must, as ClearCaptions has stated, be prepared to support the necessary outreach required to educate HCPs and take strong action against HCPs that engage in improper practices.

II. A REVERSE AUCTION IS INEQUITABLE AND ANTICOMPETITIVE

ClearCaptions continues to oppose the use of a reverse auction to set IP CTS compensation rates. As ClearCaptions noted in its Initial Comments, since market share drives margins in the IP CTS industry, a reverse auction would favor the IP CTS providers with the greatest existing market share. The result would be inequitable and confiscatory for those IP CTS providers who could not afford to participate in the auction and would dramatically limit the number of providers, reducing

² See, e.g., Initial Comments of ClearCaptions, LLC, CG Docket Nos. 13-24 and 03-123, at 11-21 and n.6 (filed Sept. 17, 2018) ("ClearCaptions Initial Comments").

competition and further concentrating the market.³ By contrast, CaptionCall, LLC (“CaptionCall”) suggests that “a well-structured reverse auction, with rigorous entry criteria . . . could be a fair and functional approach to rate-setting by encouraging competition, setting the right incentives, and effectively approximating market-based rates.”⁴ In support of this argument, CaptionCall points to the “Commission’s previous determinations that auctions are an effective mechanism to reflect market-based forces”⁵ and cites the Connect America Fund Phase II Auction and a statement by Commissioner O’Rielly in support of a reverse auction for IP CTS instead of cost-based rate regulation.⁶

CaptionCall’s proposal ignores reality. First, CaptionCall fails even to note the Commission’s rejection of a reverse auction in the context of the Video Relay Service (“VRS”),⁷ an industry with comparably unbalanced market dynamics as those observed in the IP CTS market.⁸ In considering a proposal by Sorenson Communications, Inc., CaptionCall’s parent entity, for a reverse auction to set VRS rates, the Commission noted that “[i]f a provider has no guarantee of serving a fixed number of minutes, each provider’s bid will likely be based on current costs associated with the current number of minutes they provide at the time of bidding.”⁹ The

³ ClearCaptions Initial Comments at 20-21.

⁴ Comments of CaptionCall, LLC, CG Docket Nos. 13-24 and 03-123, at 77 (filed Sept. 17, 2018) (“CaptionCall Comments”).

⁵ *Id.* at 72.

⁶ *Id.*

⁷ *In the Matter of Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Order, CG Docket Nos. 10-51 and 03-123, 32 FCC Rcd 5891, ¶ 46 (rel. July 6, 2017) (“2017 VRS Compensation Order”).

⁸ ClearCaptions Initial Comments at 15-16.

⁹ 2017 VRS Compensation Order ¶ 46.

rate resulting from a reverse auction in this context would be “either well above the average cost of providing service, or so low as to keep currently . . . [lower market share] providers from continuing or new entrants from joining the market.”¹⁰ On this basis, the Commission concluded that a reverse auction would not “promote competition, encourage greater efficiencies, and provide stability.”¹¹ Despite spending considerable time proposing a reverse auction framework for IP CTS, CaptionCall does not even attempt to explain the critical threshold issue of how, in the context of two industries with comparable market dynamics, a reverse auction could be appropriate for IP CTS when the Commission concluded that a reverse auction was inappropriate for VRS due to the large disparity in size and scale of the various providers.

Second, CaptionCall’s reliance on the Connect America Fund Phase II Auction as support for a reverse auction to set IP CTS rates is misplaced. It is true that the Commission has identified the benefits of reverse auctions for provision of Connect America Fund support. However, those benefits should be put in context. The reverse auction proposed in the Connect America Fund context was to award support to a single provider in a given area. The Commission noted that “certain commenters object to the use of a reverse auction on the grounds that a reverse auction

¹⁰ *Id.* The Commission properly noted that the former would provide “wasteful, windfall profits to the lowest cost provider.” *Id.* ¶ 46 and n.136. Moreover, the Commission observed that “[s]uch windfall profits would not only waste TRS Fund contributions but also provide a major additional resource advantage to the recipient of such profits, with the likely result of further cementing one provider’s dominant position and preventing the emergence of more effective and sustainable . . . competition.” The same can reasonably be said in this case.

¹¹ 2017 VRS Compensation Order ¶ 46. Rather the Commission noted “it seems equally or more likely to have the opposite effect—producing a VRS rate that is either well above the average cost of providing service, or so low as to keep currently higher cost providers from continuing or new entrants from joining the market.” *Id.*

would provide support to at most one bidder in an area.”¹² Ultimately, the Commission decided “not to provide support routinely to more than one provider in an area.”¹³ The landscape for IP CTS is different. The Commission has a statutory mandate to ensure that TRS is available “in a manner that is functionally equivalent to the ability of a hearing individual.”¹⁴ Competitive choice of providers has been linked to ensuring functional equivalence in the VRS context.¹⁵ The same logic applies to IP CTS such that the Commission “should undertake rate setting designed to permit and foster competition.”¹⁶ Given the preference and need for competitive choice in IP CTS, CaptionCall’s reliance on the benefits of reverse auctions in the Connect America Fund context, which were designed to select a single provider in a given area, is inapposite.¹⁷

In contrast to CaptionCall’s reverse auction proposal, which except for CaptionCall finds no current support in the record, various providers support some form of a tiered rate, along the lines of what ClearCaptions has proposed.¹⁸ MezmoCorp d/b/a InnoCaption (“InnoCaption”) “urges the Commission to adopt a tiered rate structure for IP-CTS,” noting that doing so “will allow both existing and future emerging providers to recover their reasonable costs while growing, and not overcompensate providers who have already achieved sufficient economies of scale to

¹² *In the Matter of Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, ¶ 328 (rel. Nov. 11, 2011).

¹³ *Id.*

¹⁴ 47 U.S.C. § 225(a)(3).

¹⁵ FNPRM ¶ 94.

¹⁶ ClearCaptions Initial Comments at 20.

¹⁷ ClearCaptions expects to further supplement its position on the inappropriateness of a reverse auction mechanism through a further ex parte submission.

¹⁸ *See, e.g.*, ClearCaptions Initial Comments at 11-21.

warrant lower rates.”¹⁹ Sprint Corporation (“Sprint”) also encourages the Commission to “consider a tiered rate structure approach” to the extent that it moves forward with a cost-based proposal to set rates.²⁰ Like ClearCaptions, Sprint notes that tiers are preferable to a rate based on weighted average costs since “smaller competitors would be forced out of the marketplace pursuant to a weighted average cost structure.”²¹ While InnoCaption and Sprint support, to varying degrees, a tiered rate model in principle, neither company has made a holistic proposal to the Commission like ClearCaptions.²² Absent such an alternative tiered rate proposal, ClearCaptions continues to urge the adoption of its proposal.

III. THERE IS BROAD AGREEMENT THAT ADMINISTRATION OF IP CTS SHOULD NOT BE TRANSITIONED TO THE STATES

IP CTS providers and many consumer groups agree that the states should not “be allowed or required to take a more active role in the administration of IP CTS.”²³ A coterie of consumer groups argue that “[t]he Commission should neither allow nor require states to take over administration of IP CTS in any capacity.”²⁴ The Consumer Groups Comments suggest that transitioning authority over IP CTS to the states “could result in a balkanized system of IP CTS

¹⁹ Comments of MezmoCorp d/b/a InnoCaption, CG Docket Nos. 13-24 and 03-123, at 3-4 (filed Sept. 17, 2018).

²⁰ Comments of Sprint Corporation, CG Docket Nos. 13-24 and 03-123, at 16-17 (filed September 17, 2018) (“Sprint Comments”).

²¹ *Id.* at 17; *accord* ClearCaptions Initial Comments at 11 (noting that “a tiered rate structure approximates the IP CTS market realities more accurately and also allows competitive providers to invest in growth and to reach a scale where rates can be reduced.”).

²² ClearCaptions does note, however, that InnoCaption previously proposed “[t]iers for providers who have over 5,000,000 minutes a month.” *See* MezmoCorp d/b/a InnoCaption Ex Parte Presentation, CG Docket No. 03-123 (filed May 31, 2018).

²³ FNPRM ¶ 111.

²⁴ Comments of Hearing Loss Association of America et al., CG Docket Nos. 13-24 and 03-123, at 17 (filed Sept. 17, 2018) (“Consumer Groups Comments”).

eligibility and quality requirements, an underfunded program, a decrease in consumer choice, and a failure to reach those consumers who truly need IP CTS.”²⁵ As noted in its Initial Comments, ClearCaptions wholly agrees with this assessment.²⁶

The comments also support the argument that abdication of responsibility for the administration of IP CTS to the states would be contrary to federal law. In line with ClearCaptions’ Initial Comments, CaptionCall notes that “IP CTS is an inherently *interstate* service, carried over the internet”, which, for purposes of federal law, is an information service.²⁷ To transition the administration of IP CTS to the states would contradict “the longstanding federal policy of uniform regulation of information services.”²⁸ As CaptionCall notes, Chairman Pai recently reaffirmed this policy.²⁹

Importantly, certain states have expressed their own justifiable concerns about the Commission’s proposal in this regard that should give the Commission significant pause. For example, the Pennsylvania Public Utility Commission cites impediments to state IP CTS administration, such as the need to identify “the specific functions that the states would be assuming” as well as legal issues associated with state jurisdiction.³⁰ Chief among the legal issues faced by the states is the fact that some states would need to pass “legislation or amendments to

²⁵ *Id.*

²⁶ ClearCaptions Initial Comments at 23-26.

²⁷ CaptionCall Comments at 39 (emphasis in original); ClearCaptions Initial Comments at 23.

²⁸ CaptionCall Comments at 39 (citing *In the Matter of Restoring Internet Freedom*, Declaratory Ruling, Report and Order, and Order, WC Docket No. 17-108, FCC 17-166, 33 FCC Rcd 311, 431, ¶¶ 201-202 (rel. Jan. 4, 2018)).

²⁹ CaptionCall Comments at 39-40 (citing FCC, *Chairman Pai Statement on Eighth Circuit Affirmation That State Efforts to Regulate Information Services are Preempted* (Sept. 7, 2018)).

³⁰ Comments of the Pennsylvania Public Utility Commission, CG Docket Nos. 13-24 and 03-123, at 13-18 (filed Sept. 17, 2018).

existing legislation” to confer state jurisdiction.³¹ The Nebraska Public Service Commission commented that “[b]ecause Nebraska’s laws do not currently allow for Nebraska to administer IP CTS, a transition to state administration of this program would take some time.”³² In addition, and as noted by ClearCaptions and others, the FCC would have to address the current federal policy in favor of the uniform regulation of information services. As the Nebraska Public Utilities Commission warned, the Commission “must be prepared to explicitly repeal its previous position that internet based services are exclusively under Federal jurisdiction.”³³ The time it would take to work through these various legal and policy issues would be substantial and, in some cases, would result in a “failure to reach those consumers who truly need IP CTS.”³⁴ Moreover, such a shift could have much broader regulatory implications.

IV. CLEARCAPTIONS CONTINUES TO OPPOSE IP CTS ELIGIBILITY ASSESSMENTS BY STATE TRS PROGRAMS/EDPS AS WELL AS BY HCPS

ClearCaptions continues to oppose the Commission’s proposed reliance on IP CTS eligibility assessments both by states, through state programs and equipment distribution programs (“EDPs”), and through HCPs. Regarding eligibility assessments by state TRS programs and EDPs, there is general agreement in the record that the states should not have such a role. Some stakeholders, including the consumer groups and Sprint, outwardly oppose eligibility assessment by the states.³⁵ Other stakeholders, including Hamilton Relay, Inc. (“Hamilton Relay”) and

³¹ See *id.* at 13; see also Comments of the California Public Utilities Commission, CG Docket Nos. 13-24 and 03-123, at 7 (filed Sept. 17, 2018) (noting that, in California in particular, statutory changes would be needed to address jurisdictional issues).

³² Comments of the Nebraska Public Service Commission, CG Docket Nos. 13-24 and 03-123, at 2 (filed Sept. 14, 2018).

³³ *Id.* at 5.

³⁴ Consumer Groups Comments at 17.

³⁵ Consumer Groups Comments at 14-15; Sprint Comments at 23.

CaptionCall, indirectly rule out state eligibility assessment, choosing instead to support assessment by independent, third-party HCPs.³⁶ ClearCaptions fully agrees that eligibility assessment by state programs would open the door “for states to establish different eligibility assessments” and “would be burdensome for consumers that move between states.”³⁷ Beyond the possibility of differing eligibility criteria among the states, it is entirely possible, as noted in the Consumer Groups Comments, that states may not “have the expertise and experience”³⁸ to determine IP CTS eligibility and might be incentivized to “increase IP CTS eligibility standards with the sole purpose of limiting usage.”³⁹ These considerations should deter the Commission from sanctioning a role for the states in IP CTS eligibility assessment procedures.

As noted above, Hamilton Relay and CaptionCall support eligibility certification by HCPs. As set forth in its Initial Comments, ClearCaptions sees serious problems with the use of HCPs as the Company has directly experienced instances where such professionals have exclusive arrangements with IP CTS providers that could result in the certification of ineligible users or the referral of consumers to an HCP’s “preferred provider” to the exclusion of other competitors.⁴⁰ These include instances where HCP’s refuse to execute Professional Certification Forms on behalf of their eligible patients solely because of such exclusive deals.

³⁶ Comments of Hamilton Relay, Inc., CG Docket Nos. 13-24 and 03-123, at 19 (filed Sept. 17, 2018); CaptionCall Comments at 22-37.

³⁷ Consumer Groups Comments at 14; *accord* ClearCaptions Initial Comments at 27 (noting that “qualification based on an individual’s assessment will vary by individual, by day, and by location.”).

³⁸ FNPRM ¶ 123.

³⁹ Consumer Groups Comments at 15.

⁴⁰ *See* ClearCaptions Initial Comments at 30-31.

CaptionCall cites “state law and ethical codes” that ostensibly would prevent HCPs from certifying ineligible patients or otherwise engaging in the “purportedly illegitimate practices . . . with respect to IP CTS marketing, referrals, and provider H[C]P relationships.”⁴¹ ClearCaptions contends that whatever the legal or ethical requirements may be in theory, there appear to be HCPs or their corporate offices that have engaged and continue to engage in anticompetitive, joint marketing and quid-pro-quo relationships with IP CTS providers in practice. Indeed, the Commission cites some of these practices in the FNPRM.⁴² To the extent that the Commission intends to rely on HCPs, it must, as ClearCaptions has urged, investigate and act against HCPs engaging in such schemes.

In its Initial Comments, and in lieu of the comments of some stakeholders that self-certification should continue to govern IP CTS eligibility,⁴³ ClearCaptions proposed the use of a professionally designed online eligibility assessment as an alternative to assessment by state programs and EDPs or HCPs.⁴⁴ ClearCaptions believes that such an assessment mechanism would eliminate many of the issues identified by ClearCaptions and others with respect to state or HCP eligibility assessment programs and would benefit consumers, the Commission, and the IP CTS industry generally. The Company stands ready to engage with the Commission, other IP CTS providers, HCPs, consumer groups, and the Disability Advisory Committee to further develop an understanding of what such an alternative eligibility assessment should look like.

⁴¹ CaptionCall Comments at 30-32.

⁴² FNPRM ¶ 120.

⁴³ *See, e.g.*, Consumer Groups Comments at 11-12; Sprint Comments at 22.

⁴⁴ ClearCaptions Initial Comments at 34-37.

V. CONCLUSION

ClearCaptions expects to continue to play an active role in this proceeding, which is critical to the future of the IP CTS industry. As noted herein, ClearCaptions vehemently opposes the use of a reverse auction to set IP CTS rates and instead encourages the adoption of a tiered rate model. Furthermore, the Company urges the Commission to heed the comments of IP CTS providers and other stakeholders and decline to transition IP CTS administration to the states, including with respect to eligibility assessments. To the extent that the Commission moves forward in relying on HCPs to conduct eligibility assessments, ClearCaptions respectfully requests that the Commission investigate and act against HCPs that engage in joint marketing and other schemes that could result in the certification of ineligible IP CTS users and affect competition in the IP CTS market. In addition, the Commission must also conduct significant outreach in order to ensure that HCP/IP CTS provider relationships do not limit competition or result in relationships that could lead to a consumer being forced to accept an HCP's preferred provider. Such relationships must be addressed fully and forcefully before the Commission hands over responsibility to HCPs who engage in such practices, which, among other things, can result in an immediate denial of service to a significant number of obviously eligible patients. The possibility of successfully acting against HCPs engaged in such conduct and providing the requisite level of outreach and training leads the Company again to urge the Commission to move away from the states and HCPs in determining eligibility in favor of a neutral online assessment tool. ClearCaptions would welcome the opportunity to explore the online assessment tool it proposed in its Initial Comments.

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